

HEATHER E. WILLIAMS, CA Bar 122664
Federal Defender
JAYA C. GUPTA, CA Bar 312138
Assistant Federal Defender
2300 Tulare St, Ste. 330
Fresno, CA 93721
Tel: (559) 487-5561
Fax: (559) 487-5950

Attorneys for Defendant
ARSEN TONOYAN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARSEN TONOYAN,

Defendant.

No. 1:22-cr-00085-JLT-SKO

MOTION TO WITHDRAW AS COUNSEL OF
RECORD AND APPOINT CJA COUNSEL

Jaya C. Gupta, Assistant Federal Defender, and counsel of record in the above-captioned case, hereby moves for an order allowing her to withdraw as counsel of record and for appointment of new counsel to represent defendant ARSEN TONOYAN. As grounds, she states:

1. The Federal Defender's Office was appointed to represent Arsen Tonoyan on March 30, 2022, at his initial appearance on an indictment. Dkt. #4.
2. At the time of appointment, the undersigned was an Assistant Federal Defender with the Federal Defender's Office in Fresno.
3. The undersigned has taken a position with the Federal Defender's Office in the Central District of California to be closer to her family and anticipates making the transition in late November 2022.
4. As Mr. Tonoyan is still in need to counsel to represent him, our office has contacted CJA panel attorney Melissa Baloian, who is available and willing to accept the appointment.

